



Ryan Shaffer | ryan@mss-lawfirm.com
Robert L. Stepan | rob@mss-lawfirm.com
James Murnion | james@mss-lawfirm.com
Katy Gannon | kathy@mss-lawfirm.com

January 19, 2023

Via Email and U.S. Mail

Gerry P. Fagan
Christopher T. Sweeney
Jordan W. FitzGerald
27 North 27th Street, Suite 1900
P.O. Box 2559
Billings, MT 59103

gerry.fagan@moultonbellingham.com
christopher.sweeney@moultonbellingham.com
jordan.fitzgerald@moultonbellingham.com

Re: *Caekaert & Mapley v. Watchtower Bible and Tract Society of New York, Inc., et al.*
Response to January 6, 2023 Letter regarding Discovery Responses of Mapley

Dear Gerry:

Thanks for the call last Friday regarding your discovery letter. We addressed most of your concerns by amending our previous supplemental discovery to correct the misnumbering that had occurred. Thanks for your patience with that. We discussed at length Plaintiffs concerns with what we have characterized as WTPA's contention interrogatories where counsel originally answered and we then supplemented with Plaintiffs' personal answers to the interrogatories posed. Plaintiffs are not inclined to amend or supplement those answers at this point in time. Lastly, after researching it, we do not believe that the Rules require us to itemize the pleadings and prior statements made by Defendants in other cases that we have in our possession.

Please let me know if you would like to discuss any of this further.

Sincerely,

MEYER, SHAFFER & STEPANS, PLLP

A handwritten signature in blue ink, appearing to be 'Ryan Shaffer', written over the printed name.

Ryan Shaffer

EXHIBIT 5